

Edward A. Keane*
Cornelius A. Mahoney*
Garth S. Wolfson*

Jorge A. Rodriguez**

Of Counsel
Stephen J. Murray

*Also admitted in NJ
†Also admitted in CT

MAHONEY & KEANE, LLP

Attorneys at Law
111 Broadway, Tenth Floor
New York, New York 10006
Telephone (212) 385-1422
Facsimile (212) 385-1605
lawoffices@mahoneykeane.com

Connecticut Office

14 Pilgrim Lane
Weston, CT 06883
Tel: (203) 222-1019
Fax: (203) 222-0252

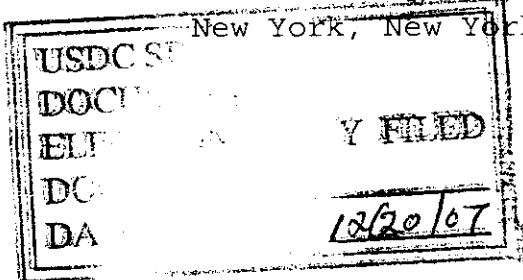
December 19, 2007

BY HAND

THE HON. LAWRENCE J. MCKINNA
United States District Judge
United States District Court
500 Pearl Street, Room 1640
New York, New York 10007

MEMO ENDORSED

DEC 20 2007



Re: OWOLABI SALIS v. AMERICAN EXPORT
LINES and ATLANTIC CONTAINER LINE
SDNY Case No.: 07 CV 6164 (LMM)
Our File No.: 12/3414

Honorable Sir:

We represent the defendant ocean carrier, ATLANTIC CONTAINER LINE (ACL), in the above-referenced action, wherein discovery is scheduled to close at the end of this month. We write with the consent of all defendants to request a 60 day extension of time to complete discovery, as well as a conference at the Court's convenience sometime after January 1, 2008.

At the August 14, 2007 initial case management conference, plaintiff's counsel stated that he would very shortly be providing discovery, including the purported ACL bills of lading, absent which ACL is unable to conduct any meaningful investigation into this still obscure cargo-related claim.

In addition to serving formal demands immediately after the conference, we followed up in writing with plaintiff in this regard on at least three subsequent occasions. To date, however, we have received no Rule 26 disclosures from plaintiff and no response to ACL's demands.

*Time to complete discovery
extended to 2/29/08. Conference
scheduled for 1/14/08 at 4:30 P.M.
So ordered. L. M. H. 12/20/07*

MAHONEY and KEANE

Most recently, we were advised that plaintiff's counsel would be traveling to Africa last week to gather documentation. After calling his office today to obtain his consent to this request, we were informed that plaintiff's counsel was on vacation and would not be returning until after the first of the year.

We thank the Court for its consideration.

Respectfully submitted,

MAHONEY & KEANE, LLP

By:


Garth S. Wolfson

cc (via fax):

Owalabi Salis, Esq.
42 Broadway, Room 1133
New York, New York 10004
Fax: (212) 742-0549

Cichanowicz, Callan, Keane,
Vengrow & Textor, LLP
61 Broadway, Suite 3000
New York, New York 10006-2802
Fax: (212) 344-7285
Attention: Patrick Michael DeCharles, II